

EXHIBIT F

Samuel Chuang, Esq.
Attorney-at-Law

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May 27, 2011

Ms. Amy Tai, Esq.
Urban Justice Center
123 William Street, 16th Floor
New York, NY 10038

Re: Gao, et al., v. 85 Perfect Team Corporation, et al., Civil Action No. 10-CV-01637
(ENV) (CLP) USDC EDNY

Dear Ms. Tai:

In response to your letter dated February 23, 2011:

Attached is a translated copy of the Answers to Plaintiff's Interrogatories dated June 25, 2010.

Also attached are affidavits from my clients further responding to your letter.

Regarding your issue with the identification of persons, Local Rule 26.3(c)(3) contains the qualification "to the extent known." Defendants have informed me that they have already provided all known identification. If there is something more in particular that you want them to deny knowledge or information of, please prepare a list for me to review.

Regarding your issue with the documents marked "Attorneys' Eyes Only," you seem to have no qualms or hesitation about posting documents containing confidential and protected documents on PACERS. There is no deadline set for submitting a protective order, and more to the point, why do you need or want to share, beyond only the attorneys, documents regarding non-parties' private information?

Sincerely,

/s/ SAMUEL CHUANG

SAMUEL CHUANG

Attorney for Defendants Perfect Team Corporation, d/b/a Guang Zhou Restaurant, Chun Kit Cheng, a/k/a Jun Jie Zheng, and Jia Li Wang

Ms. Amy Tai, Esq.
Urban Justice Center

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cc:

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*Attorney for Defendants Ji Shiang, Inc., d/b/a
Guang Zhou Restaurant & Feng Lin*

Zhuo Ping Chen
136-59 37th Avenue, 2F
Flushing, NY 11354
917-886-7629
PRO SE

Perfect Team 1 of 6.

INTERROGATORY NO. 1:

Identify all current and former owners, shareholders, officers, and directors of the Corporate Defendants, including the nature and amount of their ownership interest, their title(s) if an officer or director, and the period of times in which they held such positions or had such ownership interest.

ANSWER TO INTERROGATORY 1:

As to Perfect Team Corporation:

Chun Kit Cheng	Chairman	6/07-1/08	71.5%;	1/08-6/09	100.0%
Liai Ang	Manager	6/07-1/08	10.0%;	1/08-6/09	0.0%
Wu Rei Wu	Captain	6/07-1/08	6.0%;	1/08-6/09	0.0%
Wu Yong Qan	Captain	6/07-1/08	5.0%;	1/08-6/09	0.0%
Lang Zhong	Chef	6/07-1/08	5.0%;	1/08-6/09	0.0%
Zheng Yang Yue	Shareholder	6/07-1/08	2.5%;	1/08-6/09	0.0%

INTERROGATORY NO. 2:

Identify all persons who have participated in the operation or management of the Corporate Defendants, including the time period of such participation, and their responsibilities.

ANSWER TO INTERROGATORY 2:

The names of such persons in Perfect Team Corporation are as follows:

Liai Ang 2007
KAVIE 2008

INTERROGATORY NO. 3:

Identify and describe all assets You or Defendant Perfect Team Corporation or any of its owners, shareholders, directors, officers, managers, or attorneys transferred to Defendant Ji Shiang, Inc. or any of its owners, shareholders, directors, officers, managers, or attorneys (whether for value or by way of gift; whether real or personal property), including, but not limited to a description of the assets; the consideration paid, if any; and the identities of the transferor(s) and transferee(s).

ANSWER TO INTERROGATORY 3:

No assets were transferred to Ji Shiang, Inc. or any of its owners, shareholders, directors, officers, managers, or attorneys (whether for value or by way of gift; whether real or personal property).

INTERROGATORY NO. 4:

Perfect Team 2 of 6.

Identify the name and contact information of all attorneys, accountants, or other persons consulted in connection with the purchase, sale, transfer, or lease of the Restaurant or its assets.

ANSWER TO INTERROGATORY 4:

Allen Wu, Esq., 747 3rd Ave. New York, NY 10017.

INTERROGATORY NO 5:

Identify all individuals who have had the power to act directly or indirectly on behalf of You and state the areas in which each has the power to act on behalf of You, including, but not limited to hiring and firing workers, setting and/or changing wages, distributing wages, setting and/or changing work schedules, directing and assigning types of work, or maintaining employment records.

ANSWER TO INTERROGATORY 5:

The names of such individuals in Perfect Team Corporation are as follows:

Liai Ang
Jia Li Wang

INTERROGATORY NO. 6:

Identify all current and former employees of Corporate Defendants and indicate their dates of employment, positions, duties, hours worked, and their rate, frequency, and form of pay (e.g., cash, check, direct deposit, etc.), and their overtime rate if any.

ANSWER TO INTERROGATORY 6:

As to Perfect Team Corporation, all persons are:

Lou Fu Rong	Chef
Li Si Ying	Chef
Zen Xie Jie	Chef
Lang Zhi Zhong	Chef
Wu Wei Pie	Chef
Cheng Ang Long	Chef
Wang Wie	Chef's Assistant
Zhong Wei Xiong	Chef
Cheng Kun Jie	Chef
Fen Wei Shang	Chef
Lei Jian	Chef
Liang Zhi Gan	Headwaiter
Cheng Chun Ping	Headwaiter

Perfect Team 3 of 6.

Zheng Xia Hong	Headwaiter
Wu Wei Shun	Headwaiter
Lin Feng	Headwaiter
Zhang Shuan Shuan	Waiter
Pan Hong Hui	Waiter
Zhan Di Hui	Waiter
Zhong Shi Yie	Waiter
Tang Wei Shen?	Waiter
Wu Wei Jian	Waiter
Gao Li Rong	Waiter
Lin Pin Mei	Waiter Helper
KAVIE	Manager
Liai Ang	Manager
Wu Wei Ru	Headwaiter
Wu Yong Gan	Headwaiter
Zhong Shun Ping	Dim Sum Server
Lin Li Ran	Dim Sum Server
Chai Han Ying	Dim Sum Server
Zhong Lan Jian	Dim Sum Server
Ying Jie Xiao	Waiter
Zheng Ming	Waiter
Wu Shao Rong	Waiter Helper

See also documents annexed hereto bearing Bates Number PTC000001-PTC000062.

INTERROGATORY NO. 7:

Identify all persons with knowledge or information concerning, or who were responsible for establishing, Corporate Defendants' compensation policies, rates or procedures, including tip practices.

ANSWER TO INTERROGATORY 7:

Liai Ang and Jia Li Wang set compensation policies, rates or procedures. The tip practices were established by the head waiters.

INTERROGATORY NO. 8:

Identify all persons responsible for payment of compensation to employees, including the distribution of tips among employees.

ANSWER TO INTERROGATORY 8:

Liai Ang, Jia Li Wang, and the head waiters.

Perfect Team 4 of 6.

INTERROGATORY NO. 9:

Identify any persons who have at any time participated in the tip pool at the Restaurant.

ANSWER TO INTERROGATORY 9:

See tip notebook/ledger bearing Bates Number GAO000001-81.

INTERROGATORY NO. 10:

Identify all persons responsible for establishing and maintaining Corporate Defendants' timekeeping, payroll, bookkeeping, or accounting practices.

ANSWER TO INTERROGATORY 10:

Liai Ang and Jia Li Wang.

INTERROGATORY NO. 11:

Identify all persons with knowledge of the records maintained by Defendants concerning the wages paid and hours worked by employees of the Corporate Defendants.

ANSWER TO INTERROGATORY 11:

Liai Ang and Jia Li Wang.

INTERROGATORY NO. 12:

Describe in detail all efforts made by You or anyone else on behalf of the Corporate Defendants to determine and comply with the requirements of the FLSA and NYLI., concerning minimum wage, overtime pay, retention of gratuities, and spread of hours pay, including, but not limited to, efforts to obtain legal advice regarding the requirements of federal and state laws, and communications with any federal, state, or municipal department or agency concerning minimum wage and overtime laws and regulations. This request is not limited in time.

ANSWER TO INTERROGATORY 12:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

INTERROGATORY NO. 13:

Identify all persons who terminated or participated in the termination of each Plaintiff's employment at Perfect Team Corp., or who have knowledge of the reasons why Perfect Team Corp. terminated the Plaintiffs' employment.

ANSWER TO INTERROGATORY 13:

Although Defendants object to the Interrogatory as overly broad, such person would be Jia Li Wang.

INTERROGATORY NO. 14:

Describe any communications by Defendants to any of the Plaintiffs regarding the refusal to re-hire Plaintiffs or the termination of the Plaintiffs' employment.

ANSWER TO INTERROGATORY 14:

Although Defendants object to the Interrogatory as overly broad as well as to the characterization of the Interrogatory using "refusal to re-hire," there are no communications.

INTERROGATORY NO. 15:

Describe any evaluations, warnings, reprimands, or discipline given to any of the Plaintiffs.

ANSWER TO INTERROGATORY 15:

Xiao Hong Zheng was found to be an over-relaxed worker. She had been seriously insubordinate and caused wastage of the business's resources. She also stirred up disaffection among colleagues. She had been given chances to cure her problems but she still failed to cooperate with her supervisors.

Li Rong Gao was temperamental, provocative to customers and damaged the Restaurant's reputation

INTERROGATORY NO. 16:

Please state all facts and the application of facts to law supporting each of the affirmative defenses asserted by the Defendant.

ANSWER TO INTERROGATORY 16:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

INTERROGATORY NO. 17:

Perfect Team 6 of 6.

If you deny Admission No. 1 or No. 2, state the facts upon which you rely in denying that admission and state who you contend was the employer of the workers at the Restaurant in 2007, 2008, 2009 and 2010 for purposes of the FLSA and New York Labor Law

ANSWER TO INTERROGATORY 17:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

INTERROGATORY NO. 18:

If you deny Admission No. 3 or No. 4, state the facts upon which you rely in denying that admission and state who you contend was the employer of Perfect Team Corp.'s employees in 2007, 2008, and 2009 for purposes of the FLSA and New York Labor Law.

ANSWER TO INTERROGATORY 18:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

Interrogatory 1:

Describe all ownership interest You have or had in Corporate Defendants and all job positions and duties You performed for Corporate Defendants.

Answer to Interrogatory 1:

I owned 71.5% of Perfect Team Corporation and I was Chairman of the Board of Directors.

Interrogatory 2:

Identify all current and former owners, shareholders, officers, and directors of the Corporate Defendants, including the nature and amount of their ownership interest, their title(s) if an officer or director, and the period of times in which they held such positions or had such ownership interest.

Answer to Interrogatory 2:

The names and positions of such persons in Perfect Team Corporation are as follows:

Chun Kit Cheng	Chairman	6/07-1/08	71.5%;	1/08-6/09	100.0%
Liai Ang	Manager	6/07-1/08	10.0%;	1/08-6/09	0.0%
Wu Rei Wu	Captain	6/07-1/08	6.0%;	1/08-6/09	0.0%
Wu Yong Qan	Captain	6/07-1/08	5.0%;	1/08-6/09	0.0%
Lang Zhong	Chef	6/07-1/08	5.0%;	1/08-6/09	0.0%
Zheng Yang Yue	Shareholder	6/07-1/08	2.5%;	1/08-6/09	0.0%

Interrogatory 3

Identify all persons who have participated in the operation or management of the Corporate Defendants, including the time period of such participation, and their responsibilities.

Answer to Interrogatory 3:

The names of such persons in Perfect Team Corporation are as follows:

Liai Ang	2007
KAVIE	2008

Interrogatory 4

Identify and describe all assets You or Defendant Perfect Team Corporation or any of its owners, shareholders, directors, officers, managers, or attorneys transferred to Defendant Ji Shiang, Inc., or any of its owners, shareholders, directors, officers, managers, or attorneys (whether for value of by way of gift; whether real or personal property), including, but not limited to a description of the asset; the consideration aid, if any; and the identities of the transferor(s) and transferee(s).

Answer to Interrogatory 4:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

Interrogatory 6:

Identify all individuals who have had the power to act directly or indirectly on behalf of You and state the areas in which each has the power to act on behalf of You, including but not limited to hiring and firing workers, setting and/or changing wages, distributing wages, setting and/or changing work schedules, directing and assigning types of work, or maintaining employment records.

Answer to Interrogatory 6:

The names of such individuals in Perfect Team Corporation are as follows:

Liai Ang
Jia Li Wang

Interrogatory 7

Identify all current and former employees of Corporate Defendants, and indicate their dates of employment, positions, duties, hours worked, and their rate, frequency, and form of pay (e.g., cash, check, direct deposit, etc.), and their overtime rate if any.

Answer to Interrogatory 7

As to Perfect Team Corporation, all persons are:

Lou Fu Rong	Chef
Li Si Ying	Chef
Zen Xie Jie	Chef
Lang Zhi Zhong	Chef
Wu Wei Pie	Chef
Cheng Ang Long	Chef
Wang Wie	Chef's Assistant
Zhong Wei Xiong	Chef
Cheng Kun Jie	Chef
Fen Wei Shang	Chef
Lei Jian	Chef
Liang Zhi Gan	Headwaiter
Cheng Chun Ping	Headwaiter
Zheng Xia Hong	Headwaiter
Wu Wei Shun	Headwaiter
Lin Feng	Headwaiter
Zhang Shuan Shuan	Waiter
Pan Hong Hui	Waiter
Zhan Di Hui	Waiter
Zhong Shi Yie	Waiter
Tang Wei Shen?	Waiter
Wu Wei Jian	Waiter
Gao Li Rong	Waiter
Lin Pin Mei	Waiter Helper
KAIE	Manager
Liai Ang	Manager
Wu Wei Ru	Headwaiter
Wu Yong Gan	Headwaiter
Zhong Shun Ping	Dim Sum Server
Lin Li Ran	Dim Sum Server
Chai Han Ying	Dim Sum Server
Zhong Lan Jian	Dim Sum Server
Ying Jie Xiao	Waiter
Zheng Ming	Waiter
Wu Shao Rong	Waiter Helper

Interrogatory 10:

Identify any persons who have at any time participated in the tip pool at the Restaurant.

Answer to Interrogatory 10:

See tip notebook/ledger annexed hereto bearing Bates Number GAO000001-81.

Interrogatory 13:

Describe in detail all efforts made by You or anyone else on behalf of the Corporate Defendants to determine and comply with the requirements of the FLSA and NYLL concerning minimum wage, overtime pay, retention of gratuities, and spread of hours pay, including, but not limited to, efforts to obtain legal advice regarding the requirements of federal and state laws, and communications with any federal, state, or municipal department or agency concerning minimum wage and overtime laws and regulations. This request is not limited in time.

Answer to Interrogatory 13:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

Interrogatory 1:

Describe all ownership interest You have or had in Corporate Defendants and all job positions and duties You performed for Corporate Defendants.

Answer to Interrogatory 1:

I did not own any part of Perfect Team Corporation, and I was a Cashier.

Interrogatory 2:

Identify all current and former owners, shareholders, officers, and directors of the Corporate Defendants, including the nature and amount of their ownership interest, their title(s) if an officer or director, and the period of times in which they held such positions or had such ownership interest.

Answer to Interrogatory 2:

The names and positions of such persons in Perfect Team Corporation are as follows:

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Wu Rei Wu	Captain	6/07-1/08	6.0%;	1/08-6/09	0.0%
Wu Yong Qan	Captain	6/07-1/08	5.0%;	1/08-6/09	0.0%
Lang Zhong	Chef	6/07-1/08	5.0%;	1/08-6/09	0.0%
Zheng Yang Yue	Shareholder	6/07-1/08	2.5%;	1/08-6/09	0.0%

Interrogatory 3

Identify all persons who have participated in the operation or management of the Corporate Defendants, including the time period of such participation, and their responsibilities.

Answer to Interrogatory 3:

The names of such persons in Perfect Team Corporation are as follows:

Liai Ang	2007
KAVIE	2008

Interrogatory 4

Identify and describe all assets You or Defendant Perfect Team Corporation or any of its owners, shareholders, directors, officers, managers, or attorneys transferred to Defendant Ji Shiang, Inc., or any of its owners, shareholders, directors, officers, managers, or attorneys (whether for value of by way of gift; whether real or personal property), including, but not limited to a description of the asset; the consideration aid, if any; and the identities of the transferor(s) and transferee(s).

Answer to Interrogatory 4:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

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Identify all individuals who have had the power to act directly or indirectly on behalf of You and state the areas in which each has the power to act on behalf of You, including but not limited to hiring and firing workers, setting and/or changing wages, distributing wages, setting and/or changing work schedules, directing and assigning types of work, or maintaining employment records.

Answer to Interrogatory 6:

The names and positions of such persons in Perfect Team Corporation are as follows:

Liai Ang
Jia Li Wang

Interrogatory 7

Identify all current and former employees of Corporate Defendants, and indicate their dates of employment, positions, duties, hours worked, and their rate, frequency, and form of pay (e.g., cash, check, direct deposit, etc.), and their overtime rate if any.

Answer to Interrogatory 7

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Zhong Wei Xiong	Chef
Cheng Kun Jie	Chef
Fen Wei Shang	Chef
Lei Jian	Chef
Liang Zhi Gan	Headwaiter
Cheng Chun Ping	Headwaiter
Zheng Xia Hong	Headwaiter
Wu Wei Shun	Headwaiter
Lin Feng	Headwaiter
Zhang Shuan Shuan	Waiter
Pan Hong Hui	Waiter
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Tang Wei Shen?	Waiter
Wu Wei Jian	Waiter
Gao Li Rong	Waiter
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KAVIE	Manager
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Answer to Interrogatory 10:

See tip notebook/ledger annexed hereto bearing Bates Number GAO000001-81.

Jia Li Wang4 of 4.

Interrogatory 13:

Describe in detail all efforts made by You or anyone else on behalf of the Corporate Defendants to determine and comply with the requirements of the FLSA and NYLL concerning minimum wage, overtime pay, retention of gratuities, and spread of hours pay, including, but not limited to, efforts to obtain legal advice regarding the requirements of federal and state laws, and communications with any federal, state, or municipal department or agency concerning minimum wage and overtime laws and regulations. This request is not limited in time.

Answer to Interrogatory 13:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LI RONG GAO, SHU F. JIANG, and XIAO HONG ZHENG,

individually, and on behalf of all others similarly situated,

WEI S. TAN and WEI J. WU, individually,

Plaintiffs,

V.

PERFECT TEAM CORPORATION d/b/a
GUANG ZHOU RESTAURANT, JI SHIANG,
INC, d/b/a GUANG ZHOU RESTAURANT,
FENG LIN, CHUN KIT CHENG a/k/a JUN JIE
ZHENG, JIA LI WANG, and ZHUO PING
CHEN a/k/a CHEUK PING CHEN,

Defendants.

STATE OF NEW YORK

1

ss:

COUNTY OF QUEENS

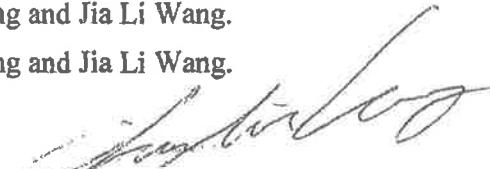
2

The undersigned, being duly sworn, deposes and says:

1. This affidavit is submitted pursuant to this Court's order dated May 13, 2011.
 2. The statements herein are to the best of my knowledge.
 3. Perfect Team and I have already provided all responsive documents.
 4. No assets of Perfect Team Corporation or mine were transferred to Ji Shiang, Inc. or any of its owners, shareholders, officers, etc.
 5. I do not know of anyone else that participated in the tip pool other than what has already been disclosed.
 6. Perfect Team's efforts to comply with federal and state labor law include, but is not limited to: posting minimum wage posters; paying for workers' compensation, disability and unemployment insurance; posting job safety notices; and not discriminating against employees.
 7. I have nothing to do with, nor do I have any knowledge relating to, Ji Shiang, Inc.
 8. Relating to Perfect Team Corporation:

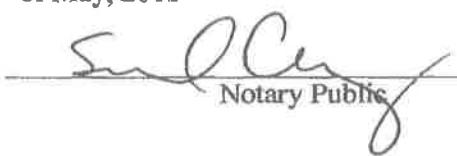
Chun Kit Cheng	Chairman	6/07-1/08	71.5%	1/08-6/09	100.0%
Liai Ang	Manager	6/07-1/08	10.0%	1/08-6/09	0.0%
Wu Rei Wu	Captain	6/07-1/08	6.0%	1/08-6/09	0.0%
Wu Yong Qan	Captain	6/07-1/08	5.0%	1/08-6/09	0.0%
Lang Zhong	Chef	6/07-1/08	5.0%	1/08-6/09	0.0%
Zheng Yang Yue	Shareholder	6/07-1/08	2.5%	1/08-6/09	0.0%

9. The persons participating in the operation or management of Perfect Team Corporation are: Liai Ang, 2007, and KAVIE, 2008.
10. The individuals who had the power to act directly or indirectly on behalf of Perfect Team Corporation, include, but is not limited to: Liai Ang (e.g., hiring and firing workers, and directing and assigning types of work) and Jia Li Wang (e.g., distributing wages and maintaining employment records).
11. I do not understand which facts or the application of facts to law relating to my affirmative defenses.
12. Relating to interrogatory #5, Allen Wu, Esq., 747 3rd Ave. New York, NY 10017.
13. Relating to interrogatory #8, Liai Ang, Jia Li Wang, and the head waiters.
14. Relating to interrogatory #9, Liai Ang, Jia Li Wang, and the head waiters.
15. Relating to interrogatory #11, Liai Ang and Jia Li Wang.
16. Relating to interrogatory #12, Liai Ang and Jia Li Wang.



CHUN KIT CHENG
Defendant Individually, and as Representative
of Defendant PERFECT TEAM
CORPORATION

Sworn to before me this 27 day
of May, 2011



Notary Public

Samuel J. Chuang
Notary Public, State of New York
No. 02CH6059545
Qualified in New York County
Commission Expires May 29, 2011

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LI RONG GAO, SHU F. JIANG, and XIAO HONG ZHENG,

individually, and on behalf of all others similarly situated,

WEI S. TAN and WEI J. WU, individually,

Plaintiffs,

v.

PERFECT TEAM CORPORATION d/b/a GUANG ZHOU RESTAURANT, JI SHIANG, INC, d/b/a GUANG ZHOU RESTAURANT, FENG LIN, CHUN KIT CHENG a/k/a JUN JIE ZHENG, JIA LI WANG, and ZHUO PING CHEN a/k/a CHEUK PING CHEN,

Defendants.

Civil Action No.
10-CV-1637 (ENV) (CLP)

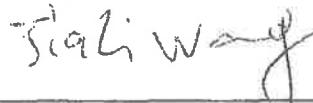
STATE OF NEW YORK)
)
COUNTY OF QUEENS)

The undersigned, being duly sworn, deposes and says:

1. This affidavit is submitted pursuant to this Court's order dated May 13, 2011.
2. The statements herein are to the best of my knowledge.
3. I have already provided all responsive documents.
4. No assets of mine were transferred to Ji Shiang, Inc. or any of its owners, shareholders, officers, etc.
5. I do not know of anyone else that participated in the tip pool other than what has already been disclosed.
6. My efforts to comply with federal and state labor law include, but is not limited to: posting minimum wage posters; paying for workers' compensation, disability and unemployment insurance; posting job safety notices; and not discriminating against employees.
7. I have nothing to do with, nor do I have any knowledge relating to, Ji Shiang, Inc.
8. Relating to Perfect Team Corporation:

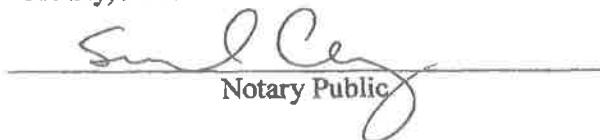
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Liai Ang	Manager	6/07-1/08	10.0%;	1/08-6/09	0.0%
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Wu Yong Qan	Captain	6/07-1/08	5.0%;	1/08-6/09	0.0%
Lang Zhong	Chef	6/07-1/08	5.0%;	1/08-6/09	0.0%
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9. The persons participating in the operation or management of Perfect Team Corporation are: Liai Ang, 2007, and KAVIE, 2008.
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15. Relating to interrogatory #11, Liai Ang and Jia Li Wang.
16. Relating to interrogatory #12, Liai Ang and Jia Li Wang.



JIA LI WANG

Sworn to before me this 27 day
of May, 2011



Notary Public

Samuel J. Chuang
Notary Public, State of New York
No. 02CH6059545
Qualified in New York County
Commission Expires May 29, 2011